March 25, 2014

Dear Sir or Madam,

It has recently come to my attention that changes are being made to the cell tower placement rules. I am happy to hear that companies will be obligated to consult with local citizens before a tower is built, regardless of its size (height) and that an approved tower will need to be built within three years of consulting with residents. These changes are helpful for citizens concerned about the health effects from the electromagnetic radiation emitted by these towers.

There are a few additions that I would like to see included in the notification and consultation process:

1) non-tower structures (building-mount, roof-top, hydro-pole, utility pole, etc.) (companies could otherwise use this loophole to avoid the public notification and consultation process), and
2) changes or modifications to existing towers/antennas already in place that would raise the RF output of the structure by more than 25% (the current changes involve the height of the tower but it is really the output of the towers that are of concern to public health)

Along with the aforementioned additions, I would also like to see the distance around a tower that requires notification as per section 5.2 (Public Consultation Process) be increased from 3 times the tower height to 10 times, given that some of the highest exposures and health effects can be experienced up to 500m from the tower, depending on the angle of the antennas.

My primary concern in requesting these additions to the proposed changes in rules is public health. I know that it is actually the mandate of Health Canada to protect vulnerable populations from environmental pollution. However, the actions of Industry Canada on this matter can have a significant impact on public health. Should more antennas in closer proximity to vulnerable populations be the unintended consequence of the new regulations (due to the loopholes identified above), the benefits from this update to CPC-2-0-03 could very well be outweighed by the resulting toll to public health. By closing the aforementioned loopholes, public health can be better protected.

Thank you

Adriana Gorski